

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

SHERIDAN THOMAS, MIRANDA
MELSON, JANE DOE 1, JANE DOE 2,
SYDNEY BRUN-OZUNA, JANE DOE 3,
CAPRI DAVIS, JANE DOE 4, JANE DOE
5, and OTHER UNIDENTIFIED FEMALE
DOES,

Plaintiffs,

vs.

BOARD OF REGENTS OF THE
UNIVERSITY OF NEBRASKA, and
individuals PETE JEYARAM, LAURIE
BELLOWES, JAKE JOHNSON,
MATTHEW HECKER, TAMIKO
STRICKMAN, JEFF LAMOUREAUX,
MEAGAN COUNLEY, RYAN FETTE,
BRIANA PALLAS-SEARS, SUE KELLY
MOORE, SANDRA CHAVEZ, and
JAMIE PEER, individually and in their
official capacities, and OTHER
UNIDENTIFIED DEFENDANTS,

Defendants.

Case No. 4:20-cv-03081

**DEFENDANTS' MOTION FOR LEAVE TO
ADDRESS AND RESPOND TO THE
UNITED STATES' STATEMENT OF
INTEREST IN THEIR REPLY BRIEF IN
SUPPORT OF MOTION TO DISMISS AND
TO SEVER**

COME NOW Defendants—the Board of Regents of the University of Nebraska (“BRUN”); Pete Jeyaram (“Jeyaram”), individually and in his official capacity; Laurie Bellows (“Bellows”), individually and in her official capacity; Jake Johnson (“Johnson”), individually and his official capacity; Meagan Counley (“Counley”), individually and in her personal capacity; Tamiko Stickman (“Strickman”), individually and in her official capacity; Matthew Hecker (“Hecker”), individually and in his official capacity; Jeff Lamoureux (“Lamoureux”), individually and in his official capacity; Ryan Fette (“Fette”), individually and in his official capacity; Briana Pallas-Sears (“Pallas-Sears”), individually and in her official capacity; Sue Kelly Moore (“Moore”), individually and in her official capacity; Sandra Chavez (“Chavez”), individually and her official capacity; and Jamie Peer (“Peer”), individually and her official capacity (collectively referred to as “Defendants”)—by and through their attorneys of record,

and hereby move the Court, pursuant to NECivR 7.1(c)(2), leave to address and respond to the United States' Statement of Interest [\[Filing No. 47\]](#) in their Reply Brief in support of Motion to Dismiss and to Sever, which is due July 7, 2021. Defendants seek leave to file response to the Statement of Interest because the arguments included therein are different from or additional to the arguments raised in the Plaintiffs' Brief in Opposition to the Motion to Dismiss and Sever [\[Filing No. 44\]](#), and without leave of this Court, Defendants will not have the opportunity to address the Statement of Interest arguments because "reply briefs may not raise new grounds for relief or present matters that do not relate to the opposing party's response." NECivR 7.1(c)(2).

Counsel for Defendants did communicate with Plaintiffs' counsel regarding this Motion, and Plaintiffs' counsel has expressed they do not have objection to this Motion.

WHEREFORE, Defendants respectfully request the Court grant their Motion for leave to respond to and address the arguments raised in the United States' Statement of Interest in their Reply Brief in support of Motion to Dismiss and to Sever, due July 7, 2021.

Dated this 17th day of June, 2021.

BOARD OF REGENTS OF THE
UNIVERSITY OF NEBRASKA; PETE
JEYARAM, in his official and individual
capacity; LAURIE BELLOWS, in her
official and individual capacities; JAKE
JOHNSON, in his individual and official
capacity; MATTHEW HECKER, in his
official capacity; TAMIKO STRICKMAN, in
her individual and official capacity; JEFF
LAMOUREAUX, in his individual and
official capacity; MEAGAN COUNLEY, in
her official and individual capacity; RYAN
FETTE, in his individual and official
capacity; BRIANA PALLAS-SEARS, in her
individual and official capacity; SUE
KELLY MOORE, in her official and
individual capacity; SANDRA CHAVEZ, in
her official and individual capacity; and
JAMIE PEER, in her official and individual
capacity, Defendants

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CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties who have entered an appearance in this case as well as electronically transmitted.

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